

# **EXHIBIT A**

## ALABAMA SJIS CASE DETAIL



County: **33** Case Number: **CV-2023-900115.00**  
Style: **AMY NICOLE SEAL V. VGW, LTD ET AL**

Court Action:

**PREPARED FOR: DANIEL LOWERY****9/27/2023 10:42:58 AM****Real Time****Case****Case Information**

County: **33-FRANKLIN** Case Number: **CV-2023-900115.00** Judge: **BPH:BRIAN P HAMILTON**  
Style: **AMY NICOLE SEAL V. VGW, LTD ET AL**  
Filed: **08/25/2023** Case Status: **ACTIVE** Case Type: **OTHER TORT**  
Trial Type: **BENCH** Track: Appellate Case: **0**  
No of Plaintiffs: **1** No of Defendants: **4**

**Damages**

Damage Amt: **0.00** Punitive Damages: **0.00** General Damages: **0.00**  
No Damages: Compensatory Damages: **0.00**  
Pay To: Payment Frequency: Cost Paid By:

**Court Action**

Court Action Code: Court Action Desc: Court Action Date:  
Num of Trial days: **0** Num of Liens: **0** Judgment For:  
Disposition Date of Appeal: Disposition Judge: : Disposition Type:  
Revised Judgement Date: Minstral: Appeal Date:  
Date Trial Began but No Verdict (TBNV1):  
Date Trial Began but No Verdict (TBNV2):

**Comments**

Comment 1:  
Comment 2:

**Appeal Information**

Appeal Date: Appeal Case Number: Appeal Court:  
Appeal Status: Origin Of Appeal:  
Appeal To: Appeal To Desc: LowerCourt Appeal Date:  
Disposition Date Of Appeal: Disposition Type Of Appeal:

**Administrative Information**

Transfer to Admin Doc Date: Transfer Reason: Transfer Desc:  
Number of Subpoenas: Last Update: **08/25/2023** Updated By: **AJA**

**Parties****Party 1 - Plaintiff INDIVIDUAL - SEAL AMY NICOLE****Party Information**

Party: **C001-Plaintiff** Name: **SEAL AMY NICOLE** Type: **I-INDIVIDUAL**  
Index: **D VGW, LTD** Alt Name: Hardship: **No** JID: **BPH**  
Address 1: **312 JACINTO ROAD** Phone: **(256) 000-0000**

Address 2:  
City: **RUSSELLVILLE** State: **AL** Zip: **35653-0000** Country: **US**  
SSN: **XXX-XX-X855** DOB: Sex: **F** Race:

### Court Action

Court Action: Court Action Date:  
Amount of Judgement: **\$0.00** Court Action For: Exemptions:  
Cost Against Party: **\$0.00** Other Cost: **\$0.00** Date Satisfied:  
Comment: Arrest Date:  
Warrant Action Date: Warrant Action Status: Status Description:

### Service Information

Issued: Issued Type: Reissue: Reissue Type:  
Return: Return Type: Return: Return Type:  
Served: Service Type Service On: Notice of No Answer:  
Answer: Answer Type: Notice of No Service: Served By:

### Attorneys

| Number     | Attorney Code | Type of Counsel | Name                      | Email                   | Phone          |
|------------|---------------|-----------------|---------------------------|-------------------------|----------------|
| Attorney 1 | BOW037        |                 | BOWLING JEFFREY LOWELL    | JEFFBRBPC@BELLSOUTH.NET | (256) 332-2880 |
| Attorney 2 | MCR008        |                 | MCREYNOLDS JOHN ANDREW IV | JOHNMCBRBPC@GMAIL.COM   | (256) 332-2880 |
| Attorney 3 | HAR411        |                 | HARGETT EVAN MICHAEL      | EVANBRBPC@GMAIL.COM     | (256) 332-2880 |
| Attorney 4 | DAV009        |                 | DAVIS DUDLEY FRANK        | FDAVIS@DAVISNORRIS.COM  | (205) 930-9900 |
| Attorney 5 | NOR041        |                 | NORRIS JOHN EDWARD        | JNORRIS@DAVISNORRIS.COM | (205) 930-9900 |
| Attorney 6 | WAR089        |                 | WARE DARGAN MANER         | DWARE@DAVISNORRIS.COM   | (205) 930-9900 |

## Party 2 - Defendant BUSINESS - VGW, LTD

### Party Information

Party: **D001-Defendant** Name: **VGW, LTD** Type: **B-BUSINESS**  
Index: **C SEAL AMY** Alt Name: Hardship: **No** JID: **BPH**  
Address 1: **1840 FOLSOM STREET** Phone: **(256) 000-0000**  
Address 2: **SUITE 302**  
City: **BOULDER** State: **CO** Zip: **80302-0000** Country: **US**  
SSN: **XXX-XX-X999** DOB: Sex: Race:

### Court Action

Court Action: Court Action Date:  
Amount of Judgement: **\$0.00** Court Action For: Exemptions:  
Cost Against Party: **\$0.00** Other Cost: **\$0.00** Date Satisfied:  
Comment: Arrest Date:  
Warrant Action Date: Warrant Action Status: Status Description:

### Service Information

Issued: **08/25/2023** Issued Type: **C-CERTIFIED MAIL** Reissue: Reissue Type:  
Return: Return Type: Return: Return Type:  
Served: **09/18/2023** Service Type: **C-CERTIFIED MAIL** Service On: Notice of No Answer:  
Answer: Answer Type: Notice of No Service: Served By:

### Attorneys

| Number     | Attorney Code | Type of Counsel | Name   | Email | Phone |
|------------|---------------|-----------------|--------|-------|-------|
| Attorney 1 | 000000        |                 | PRO SE |       |       |

**Party 3 - Defendant BUSINESS - VGW HOLDINGS US, INC.****Party Information**

|            |                    |           |                       |           |                |
|------------|--------------------|-----------|-----------------------|-----------|----------------|
| Party:     | D002-Defendant     | Name:     | VGW HOLDINGS US, INC. | Type:     | B-BUSINESS     |
| Index:     | C SEAL AMY         | Alt Name: |                       | Hardship: | No             |
| Address 1: | 1840 FOLSOM STREET |           |                       | JID:      | BPH            |
| Address 2: | SUITE 302          |           |                       | Phone:    | (256) 000-0000 |
| City:      | BOULDER            | State:    | CO                    | Zip:      | 80302-0000     |
| SSN:       | XXX-XX-X999        | DOB:      |                       | Country:  | US             |
|            |                    |           |                       | Sex:      |                |
|            |                    |           |                       | Race:     |                |

**Court Action**

|                      |        |                     |             |
|----------------------|--------|---------------------|-------------|
| Court Action:        |        | Court Action Date:  |             |
| Amount of Judgement: | \$0.00 | Court Action For:   | Exemptions: |
| Cost Against Party:  | \$0.00 | Other Cost:         | \$0.00      |
| Comment:             |        | Date Satisfied:     |             |
| Warrant Action Date: |        | Arrest Date:        |             |
|                      |        | Status Description: |             |

**Service Information**

|         |            |               |                  |                       |  |                      |  |
|---------|------------|---------------|------------------|-----------------------|--|----------------------|--|
| Issued: | 08/25/2023 | Issued Type:  | C-CERTIFIED MAIL | Reissue:              |  | Reissue Type:        |  |
| Return: |            | Return Type:  |                  | Return:               |  | Return Type:         |  |
| Served: |            | Service Type: |                  | Service On:           |  | Notice of No Answer: |  |
| Answer: |            | Answer Type:  |                  | Notice of No Service: |  | Served By:           |  |

**Attorneys**

| Number     | Attorney Code | Type of Counsel | Name   | Email | Phone |
|------------|---------------|-----------------|--------|-------|-------|
| Attorney 1 | 000000        |                 | PRO SE |       |       |

**Party 4 - Defendant BUSINESS - VGW US, INC.****Party Information**

|            |                    |           |              |           |                |
|------------|--------------------|-----------|--------------|-----------|----------------|
| Party:     | D003-Defendant     | Name:     | VGW US, INC. | Type:     | B-BUSINESS     |
| Index:     | C SEAL AMY         | Alt Name: |              | Hardship: | No             |
| Address 1: | 1840 FOLSOM STREET |           |              | JID:      | BPH            |
| Address 2: | SUITE 302          |           |              | Phone:    | (256) 000-0000 |
| City:      | BOULDER            | State:    | CO           | Zip:      | 80302-0000     |
| SSN:       | XXX-XX-X999        | DOB:      |              | Country:  | US             |
|            |                    |           |              | Sex:      |                |
|            |                    |           |              | Race:     |                |

**Court Action**

|                      |        |                     |             |
|----------------------|--------|---------------------|-------------|
| Court Action:        |        | Court Action Date:  |             |
| Amount of Judgement: | \$0.00 | Court Action For:   | Exemptions: |
| Cost Against Party:  | \$0.00 | Other Cost:         | \$0.00      |
| Comment:             |        | Date Satisfied:     |             |
| Warrant Action Date: |        | Arrest Date:        |             |
|                      |        | Status Description: |             |

**Service Information**

|         |            |               |                  |                       |  |                      |  |
|---------|------------|---------------|------------------|-----------------------|--|----------------------|--|
| Issued: | 08/25/2023 | Issued Type:  | C-CERTIFIED MAIL | Reissue:              |  | Reissue Type:        |  |
| Return: |            | Return Type:  |                  | Return:               |  | Return Type:         |  |
| Served: |            | Service Type: |                  | Service On:           |  | Notice of No Answer: |  |
| Answer: |            | Answer Type:  |                  | Notice of No Service: |  | Served By:           |  |

## Attorneys

Case 3:23-cv-01295-LCB Document 1-1 Filed 09/29/23 Page 5 of 40

| Number     | Attorney Code | Type of Counsel | Name   | Email | Phone |
|------------|---------------|-----------------|--------|-------|-------|
| Attorney 1 | 000000        |                 | PRO SE |       |       |

## Party 5 - Defendant BUSINESS - VGW LUCKYLAND, INC.

## Party Information

|            |                    |           |                     |           |                |
|------------|--------------------|-----------|---------------------|-----------|----------------|
| Party:     | D004-Defendant     | Name:     | VGW LUCKYLAND, INC. | Type:     | B-BUSINESS     |
| Index:     | C SEAL AMY         | Alt Name: |                     | Hardship: | No             |
| Address 1: | 1840 FOLSOM STREET |           |                     | JID:      | BPH            |
| Address 2: | SUITE 302          |           |                     | Phone:    | (256) 000-0000 |
| City:      | BOULDER            | State:    | CO                  | Zip:      | 80302-0000     |
| SSN:       | XXX-XX-X999        | DOB:      |                     | Country:  | US             |
|            |                    |           |                     | Sex:      |                |
|            |                    |           |                     | Race:     |                |

## Court Action

|                      |        |                     |        |
|----------------------|--------|---------------------|--------|
| Court Action:        |        | Court Action Date:  |        |
| Amount of Judgement: | \$0.00 | Court Action For:   |        |
| Cost Against Party:  | \$0.00 | Other Cost:         | \$0.00 |
| Comment:             |        | Date Satisfied:     |        |
| Warrant Action Date: |        | Arrest Date:        |        |
|                      |        | Status Description: |        |

## Service Information

|         |            |               |                  |                       |  |                      |  |
|---------|------------|---------------|------------------|-----------------------|--|----------------------|--|
| Issued: | 08/25/2023 | Issued Type:  | C-CERTIFIED MAIL | Reissue:              |  | Reissue Type:        |  |
| Return: |            | Return Type:  |                  | Return:               |  | Return Type:         |  |
| Served: |            | Service Type: |                  | Service On:           |  | Notice of No Answer: |  |
| Answer: |            | Answer Type:  |                  | Notice of No Service: |  | Served By:           |  |

## Attorneys

| Number     | Attorney Code | Type of Counsel | Name   | Email | Phone |
|------------|---------------|-----------------|--------|-------|-------|
| Attorney 1 | 000000        |                 | PRO SE |       |       |

## Financial

## Fee Sheet

| Fee Status | Admin Fee | Fee Code | Payor | Payee | Amount Due | Amount Paid | Balance | Amount Hold | Garnish Party |
|------------|-----------|----------|-------|-------|------------|-------------|---------|-------------|---------------|
| ACTIVE     | N         | AOCC     | C001  | 000   | \$68.28    | \$68.28     | \$0.00  | \$0.00      | 0             |
| ACTIVE     | N         | CONV     | C001  | 000   | \$16.62    | \$16.62     | \$0.00  | \$0.00      | 0             |
| ACTIVE     | N         | CV05     | C001  | 000   | \$301.00   | \$301.00    | \$0.00  | \$0.00      | 0             |
| ACTIVE     | N         | VADM     | C001  | 000   | \$45.00    | \$45.00     | \$0.00  | \$0.00      | 0             |
| Total:     |           |          |       |       | \$430.90   | \$430.90    | \$0.00  | \$0.00      |               |

## Financial History

| Transaction Date | Description | Disbursement Account | Transaction Batch | Receipt Number | Amount   | From Party | To Party | Money Type | Admin Fee | Reason | Attorney | Operator |
|------------------|-------------|----------------------|-------------------|----------------|----------|------------|----------|------------|-----------|--------|----------|----------|
| 08/25/2023       | RECEIPT     | AOCC                 | 2023234           | 14752000       | \$68.28  | C001       | 000      |            | N         |        |          | MMC      |
| 08/25/2023       | CREDIT      | CONV                 | 2023234           | 14752100       | \$16.62  | C001       | 000      |            | N         |        |          | MMC      |
| 08/25/2023       | RECEIPT     | CV05                 | 2023234           | 14752200       | \$301.00 | C001       | 000      |            | N         |        |          | MMC      |
| 08/25/2023       | RECEIPT     | VADM                 | 2023234           | 14752300       | \$45.00  | C001       | 000      |            | N         |        |          | MMC      |

## Case Action Summary

| Date:     | Time     | Code | Comments                           | Operator |
|-----------|----------|------|------------------------------------|----------|
| 8/25/2023 | 12:03 PM | FILE | FILED THIS DATE: 08/25/2023 (AV01) | AJA      |

|           |          |       |   |        |
|-----------|----------|-------|---|--------|
| 8/25/2023 | 12:03 PM | EORD  | E-ORDER FLAG SET TO "Y" (AV01)                    | AJA    |
| 8/25/2023 | 12:03 PM | ASSJ  | ASSIGNED TO JUDGE: BRIAN P HAMILTON (AV01)        | AJA    |
| 8/25/2023 | 12:03 PM | SCAN  | CASE SCANNED STATUS SET TO: N (AV01)              | AJA    |
| 8/25/2023 | 12:03 PM | TDMN  | BENCH/NON-JURY TRIAL REQUESTED (AV01)             | AJA    |
| 8/25/2023 | 12:03 PM | STAT  | CASE ASSIGNED STATUS OF: ACTIVE (AV01)            | AJA    |
| 8/25/2023 | 12:03 PM | ORIG  | ORIGIN: INITIAL FILING (AV01)                     | AJA    |
| 8/25/2023 | 12:03 PM | ECOMP | COMPLAINT E-FILED.                                | BOW037 |
| 8/25/2023 | 12:03 PM | D001  | D001 PARTY ADDED: VGW, LTD (AV02)                 | AJA    |
| 8/25/2023 | 12:03 PM | D001  | INDIGENT FLAG SET TO: N (AV02)                    | AJA    |
| 8/25/2023 | 12:03 PM | D001  | LISTED AS ATTORNEY FOR D001: PRO SE (AV02)        | AJA    |
| 8/25/2023 | 12:03 PM | D001  | CERTIFIED MAI ISSUED: 08/25/2023 TO D001 (AV02)   | AJA    |
| 8/25/2023 | 12:03 PM | D001  | D001 E-ORDER FLAG SET TO "Y" (AV02)               | AJA    |
| 8/25/2023 | 12:03 PM | D002  | D002 PARTY ADDED: VGW HOLDINGS US, INC. (AV02)    | AJA    |
| 8/25/2023 | 12:03 PM | D002  | INDIGENT FLAG SET TO: N (AV02)                    | AJA    |
| 8/25/2023 | 12:03 PM | D002  | LISTED AS ATTORNEY FOR D002: PRO SE (AV02)        | AJA    |
| 8/25/2023 | 12:03 PM | D002  | CERTIFIED MAI ISSUED: 08/25/2023 TO D002 (AV02)   | AJA    |
| 8/25/2023 | 12:03 PM | D002  | D002 E-ORDER FLAG SET TO "Y" (AV02)               | AJA    |
| 8/25/2023 | 12:03 PM | D003  | D003 PARTY ADDED: VGW US, INC. (AV02)             | AJA    |
| 8/25/2023 | 12:03 PM | D003  | INDIGENT FLAG SET TO: N (AV02)                    | AJA    |
| 8/25/2023 | 12:03 PM | D003  | LISTED AS ATTORNEY FOR D003: PRO SE (AV02)        | AJA    |
| 8/25/2023 | 12:03 PM | D003  | CERTIFIED MAI ISSUED: 08/25/2023 TO D003 (AV02)   | AJA    |
| 8/25/2023 | 12:03 PM | D003  | D003 E-ORDER FLAG SET TO "Y" (AV02)               | AJA    |
| 8/25/2023 | 12:03 PM | D004  | D004 PARTY ADDED: VGW LUCKYLAND, INC. (AV02)      | AJA    |
| 8/25/2023 | 12:03 PM | D004  | INDIGENT FLAG SET TO: N (AV02)                    | AJA    |
| 8/25/2023 | 12:03 PM | D004  | LISTED AS ATTORNEY FOR D004: PRO SE (AV02)        | AJA    |
| 8/25/2023 | 12:03 PM | D004  | CERTIFIED MAI ISSUED: 08/25/2023 TO D004 (AV02)   | AJA    |
| 8/25/2023 | 12:03 PM | D004  | D004 E-ORDER FLAG SET TO "Y" (AV02)               | AJA    |
| 8/25/2023 | 12:03 PM | C001  | C001 PARTY ADDED: SEAL AMY NICOLE (AV02)          | AJA    |
| 8/25/2023 | 12:03 PM | C001  | INDIGENT FLAG SET TO: N (AV02)                    | AJA    |
| 8/25/2023 | 12:03 PM | C001  | LISTED AS ATTORNEY FOR C001: BOWLING JEFFREY LOWE | AJA    |
| 8/25/2023 | 12:03 PM | C001  | LISTED AS ATTORNEY FOR C001: MCREYNOLDS JOHN ANDR | AJA    |
| 8/25/2023 | 12:03 PM | C001  | LISTED AS ATTORNEY FOR C001: HARGETT EVAN MICHAEL | AJA    |
| 8/25/2023 | 12:03 PM | C001  | LISTED AS ATTORNEY FOR C001: DAVIS DUDLEY FRANK   | AJA    |
| 8/25/2023 | 12:03 PM | C001  | LISTED AS ATTORNEY FOR C001: NORRIS JOHN EDWARD   | AJA    |
| 8/25/2023 | 12:03 PM | C001  | LISTED AS ATTORNEY FOR C001: WARE DARGAN MANER    | AJA    |
| 8/25/2023 | 12:03 PM | C001  | C001 E-ORDER FLAG SET TO "Y" (AV02)               | AJA    |
| 8/31/2023 | 10:10 AM | ESCAN | SCAN - FILED 8/25/2023 - CERTIFIED MAIL           | MMC    |
| 9/21/2023 | 2:09 PM  | D001  | SERVICE OF CERTIFIED MAI ON 09/18/2023 FOR D001   | MMC    |
| 9/21/2023 | 2:10 PM  | ESERC | SERVICE RETURN                                    | MIC    |

## Images

| Date:                 | Doc# | Title                        | Description                | Pages |
|-----------------------|------|------------------------------|----------------------------|-------|
| 8/25/2023 12:03:30 PM | 1    | CIVIL_COVER_SHEET            | CIRCUIT COURT - CIVIL CASE | 1     |
| 8/25/2023 12:03:31 PM | 2    | COMPLAINT                    |                            | 13    |
| 8/25/2023 12:04:10 PM | 3    | COMPLAINT - TRANSMITTAL      | E-NOTICE TRANSMITTALS      | 5     |
| 8/25/2023 12:04:11 PM | 4    | COMPLAINT - SUMMONS          | E-NOTICE TRANSMITTALS      | 4     |
| 8/25/2023 12:00:05 AM | 5    | CERTIFIED MAIL               |                            | 4     |
| 9/21/2023 2:10:19 PM  | 6    | SERVICE RETURN               | SERVICE RETURN             | 1     |
| 9/21/2023 2:10:23 PM  | 7    | SERVICE RETURN - TRANSMITTAL | E-NOTICE TRANSMITTALS      | 6     |



**END OF THE REPORT**



|   |   |   |   |
|---|---|---|---|
| State of Alabama<br>Unified Judicial System<br>Form ARCiv-93 Rev. 9/18  | <b>COVER SHEET</b><br><b>CIRCUIT COURT - CIVIL CASE</b><br>(Not For Domestic Relations Cases) | Cas<br><b>33</b><br>Date of Filing:<br>08/25/2023   | 33-CV-2023-900115.00<br>CIRCUIT COURT OF<br>FRANKLIN COUNTY, ALABAMA<br>ANITA SCOTT, CLERK<br>Judge Code: |
| <b>GENERAL INFORMATION</b>  |   |   |   |
| <b>IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA</b><br><b>AMY NICOLE SEAL v. VGW, LTD ET AL</b>   |   |   |   |
| <b>First Plaintiff:</b> <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual<br><input type="checkbox"/> Government <input type="checkbox"/> Other  |   | <b>First Defendant:</b> <input checked="" type="checkbox"/> Business <input type="checkbox"/> Individual<br><input type="checkbox"/> Government <input type="checkbox"/> Other  |   |
| <b>NATURE OF SUIT:</b> Select primary cause of action, by checking box (check only one) that best characterizes your action:  |   |   |   |
| <b>TORTS: PERSONAL INJURY</b><br><input type="checkbox"/> WDEA - Wrongful Death<br><input type="checkbox"/> TONG - Negligence: General<br><input type="checkbox"/> TOMV - Negligence: Motor Vehicle<br><input type="checkbox"/> TOWA - Wantonness<br><input type="checkbox"/> TOPL - Product Liability/AEMLD<br><input type="checkbox"/> TOMM - Malpractice-Medical<br><input type="checkbox"/> TOLM - Malpractice-Legal<br><input type="checkbox"/> TOOM - Malpractice-Other<br><input type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation<br><input checked="" type="checkbox"/> TOXX - Other: _____ |   | <b>OTHER CIVIL FILINGS (cont'd)</b><br><input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/ Enforcement of Agency Subpoena/Petition to Preserve<br><input type="checkbox"/> CVRT - Civil Rights<br><input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way<br><input type="checkbox"/> CTMP - Contempt of Court<br><input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure<br><input type="checkbox"/> TOCN - Conversion<br><input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/ Injunction Election Contest/Quiet Title/Sale For Division<br><input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer<br><input type="checkbox"/> FORJ - Foreign Judgment<br><input type="checkbox"/> FORF - Fruits of Crime Forfeiture<br><input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition<br><input type="checkbox"/> PFAB - Protection From Abuse<br><input type="checkbox"/> EPFA - Elder Protection From Abuse<br><input type="checkbox"/> QTLB - Quiet Title Land Bank<br><input type="checkbox"/> FELA - Railroad/Seaman (FELA)<br><input type="checkbox"/> RPRO - Real Property<br><input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship<br><input type="checkbox"/> COMP - Workers' Compensation<br><input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case |   |
| <b>TORTS: PERSONAL INJURY</b><br><input type="checkbox"/> TOPE - Personal Property<br><input type="checkbox"/> TORE - Real Property   |   |   |   |
| <b>OTHER CIVIL FILINGS</b><br><input type="checkbox"/> ABAN - Abandoned Automobile<br><input type="checkbox"/> ACCT - Account & Nonmortgage<br><input type="checkbox"/> APAA - Administrative Agency Appeal<br><input type="checkbox"/> ADPA - Administrative Procedure Act<br><input type="checkbox"/> ANPS - Adults in Need of Protective Service   |   |   |   |
| <b>ORIGIN:</b> F <input checked="" type="checkbox"/> <b>INITIAL FILING</b><br><br>R <input type="checkbox"/> <b>REMANDED</b>  |   | A <input type="checkbox"/> <b>APPEAL FROM DISTRICT COURT</b><br><br>T <input type="checkbox"/> <b>TRANSFERRED FROM OTHER CIRCUIT COURT</b>  |   |
| <b>HAS JURY TRIAL BEEN DEMANDED?</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO  |   | <b>Note:</b> Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P, for procedure)  |   |
| <b>RELIEF REQUESTED:</b> <input checked="" type="checkbox"/> <b>MONETARY AWARD REQUESTED</b> <input type="checkbox"/> <b>NO MONETARY AWARD REQUESTED</b>  |   |   |   |
| <b>ATTORNEY CODE:</b><br>BOW037   |   | 8/25/2023 12:03:29 PM<br>Date   |   |
|   |   | /s/ JEFFREY LOWELL BOWLING<br>Signature of Attorney/Party filing this form  |   |
| <b>MEDIATION REQUESTED:</b> <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <b>UNDECIDED</b>   |   |   |   |
| <b>Election to Proceed under the Alabama Rules for Expedited Civil Actions:</b>   |   | <input type="checkbox"/> YES <input type="checkbox"/> NO  |   |

ELECTRONICALLY FILED  
8/25/2023 12:03 PM  
33-CV-2023-900115.00  
CIRCUIT COURT OF  
FRANKLIN COUNTY, ALABAMA  
ANITA SCOTT, CLERK

IN THE CIRCUIT COURT  
OF FRANKLIN COUNTY ALABAMA

AMY NICOLE SEAL,

Plaintiff,

v.

VGW, LTD., VGW HOLDINGS,  
US, INC., VGW US, INC., VGW  
LUCKYLAND, INC.

Defendants.

Case No.:

COMPLAINT

1. This case is brought pursuant to Section 8-1-150(b) of the Alabama Code, which allows “*any other person*” to recover money lost in gambling “for the use of the wife...children or ... next of kin of the loser.” Ala. Code § 8-1-150(b) (emphasis supplied). As will be explained in detail below, this suit, brought by an individual for the use of those named in the statute, is not a class action pursuant to Rule 23 of the Alabama Rules of Civil Procedure. The legislature has chosen to allow *any person* to bring the case, and to allow the benefit to accrue to the family of the losing gamblers, whether or not that person is a proper class representative under Rule 23. It is also not a mass action under the federal Class Action Fairness Act since it is brought by one person. This suit is what is typically called a private



attorney general action. Plaintiff does not seek to recover for the family members of any gambler who lost \$75,000 or more during the limitations period.

2. Defendant VGW makes available online games and applications across multiple platforms, that are games of chance, and thus illegal gambling, under Alabama law. Such games violate Alabama law if a patron pays money for the chance to win anything of value. As will be explained below, VGW's games allow players to win free or extended playing time, which is a thing of value under Alabama Law. Ala. Code § 13A-12-20(11).

### **PARTIES, JURISDICTION, AND VENUE**

3. Plaintiff Amy Nicole Seal is an adult resident citizen of Franklin County, Alabama.

4. Defendant VGW, Ltd., is a foreign corporation headquartered in Perth, Australia. It does business through its online gambling games in all counties in Alabama, including Plaintiff's resident county. It does not have a physical place of business in the state of Alabama.

5. Defendants VGW Holdings US, Inc., VGW US, Inc., and VGW Luckyland, Inc., are each a corporation organized under the laws of the state of Delaware, with its principal place of business in Boulder, Colorado. They each do business through online gambling games in all counties in Alabama, including

Plaintiff's resident county. None of them have a physical place of business in the state of Alabama.

### FACTUAL BACKGROUND

6. Defendants, collectively "VGW," makes available online games of chance in a variety of formats including, but not limited to, slot machines, other casino-style games, card games and other games of chance. Below is a typical example of the games available on these sites:



7. Customers initially receive some free coins to play the games. They then spend coins to play the game. For example, on the slot type games customers spend some of their coins to spin the reels. If they lose, they lose the coins wagered. If they win, they win additional coins allowing them to play longer. When a consumer runs out of coins entirely, they must purchase coins if they wish to

continue playing the game with full functionality. Customers who purchase these coins do so to bet them in the same manner described above.

8. Defendant collects millions of dollars in revenue each year from consumers who purchase coins on its websites and applications and use them to play the slot machines and other games of chance found there.

### ALABAMA'S GAMBLING LAWS

9. “[T]he public policy of this State, as recorded in the Constitution, is that illegal gambling is harmful.” Alabama v. Epic Tech, L.L.C., 323 So.3d 572, 582 (Ala. 2020). Indeed, as stated by our Supreme Court as long ago as 1888 and as recently as 2020, Alabama’s judiciary has long recognized the Legislature’s condemnation of the societal harm of illegal gambling:

This construction is in full harmony with the policy of the constitution and laws of Alabama prohibitory of the vicious system of lottery schemes and the evil practice of gaming, in all their protean shapes, tending, as centuries of human experience now fully attest, to mendicancy and idleness on the one hand, and moral profligacy and debauchery on the other. No state has more steadfastly emphasized its disapprobation of all these gambling devices of money-making by resort to schemes of chance than Alabama. For more than 40 years past -- we may say, from the organization of the state, with some few years of experimental leniency -- the voice of the legislature has been loud and earnest in its condemnation of these immoral practices, now deemed so enervating to the public morals.

State v. Epic Tech, LLC, 323 So. 3d 572, 582 (Ala. 2020) (quoting Johnson v. State, 83 Ala. 65, 3 So. 790, 791 (1888)).

10. Alabama's public policy against gambling, as embodied in the Alabama Constitution, is so strong that its Legislature cannot permit a game of chance involving some skill unless skill is the dominant factor, not chance. Opinion of Justices, 795 So. 2d 630 (Ala. 2001) (referencing Section 65 of the Alabama Constitution).

11. The Alabama criminal laws pertaining to gambling are codified at Sections 13A-12-20 through 13A-12-92 of the Code of Alabama, 1975. Section 13A-12-22(a) states "[a] person commits the crime of promoting gambling if he knowingly advances or profits from unlawful gambling activity otherwise than as a player." Section 13A-12-23 adds: "A person commits the crime of conspiracy to promote gambling if he conspires to advance, or profit from gambling activity, otherwise than as a player."

12. The statute also defines gambling itself. "A person engages in gambling if he stakes or risks something of value upon the outcome of a contest of chance or a future contingent event not under his control or influence, upon an agreement or understanding that he or someone else will receive something of value in the event of a certain outcome." Ala. Code § 13A-12-20(4) (1975).

13. As noted above, players of defendants' games pay real money to purchase coins, which they then wager in the hopes of winning more coins so that they can continue to play without making additional purchases. They make this

wager on the outcome of the spin of a slot machine or the results of other gambling games.

14. Under Alabama law, “something of value” specifically includes “extension of a service entertainment or a privilege of playing at a game or scheme without charge.” Ala. Code § 13A-12-20(11). As a matter of law, paying money to get “coins” that one bets hoping to win more coins so as to gain the “privilege of playing at a game or scheme without charge” is gambling a thing of value in Alabama.

15. Alabama law also defines the term “contest of chance” to include “[a]ny contest, game, gaming scheme or gaming device in which the outcome depends in a material degree upon an element of chance, notwithstanding that skill of the contestants may also be a factor therein.” Ala. Code § 13A-12-20(3). Defendants’ gambling games are contests of chance under Alabama law.

16. As noted above, Alabama law provides a statutory civil cause of action to recover money paid and lost due to gambling. Ala. Code § 8-1-150. Subsection (b) of the statute provides:

(b) *Any other person* may also recover the amount of such money, thing, or its value by an action commenced within 12 months after the payment or delivery thereof for the use of the wife or, if no wife, the children or, if no children, the next of kin of the loser.

Ala. Code § 8-1-150(b) (emphasis supplied). Plaintiff Amy Nicole Seal is such an “other person” with respect to every Alabama citizen who paid money to VGW to

play gambling games within the past 12 months. The Alabama Legislature, therefore, has explicitly authorized her to bring this action to return that money to the families of the Alabamians who lost it. Plaintiff does not seek to recover the losses of any Alabama citizen who lost \$75,000 or more during the statute of limitations period.

17. While there is a dearth of Alabama caselaw interpreting the plain language of Section 8-1-150(b), authority from other states with similarly-worded statutes make it plain that such provisions should be enforced according to their unambiguous meaning. A notable recent example is Commonwealth ex rel. Brown v. Stars Interactive Holdings (IOM), Ltd., 617 S.W. 3d 792 (Ky. 2020), where the Supreme Court of Kentucky was faced with a similar gambling recovery statute authorizing “any other person” to sue and recover for gambling losses incurred by Kentucky citizens. In that case, the state of Kentucky sued the offshore operator of an online gambling site called PokerStars. The state sought recovery of all losses by Kentucky citizens, invoking a statute very similar to Alabama’s authorizing “any other person” to recover gambling losses. The defendant argued that the state was not a “person” within the meaning of the statute. The supreme court rejected that argument and reinstated the state’s judgment against the defendant, reasoning that the word “any” in the phrase “any other person” “means one indiscriminately of whatever kind or class; one, no matter what one and is an indefinite pronominal



adjective used to designate objects in a general way without pointing out any one in particular. By using the phrase ‘any other person,’ the General Assembly plainly expressed that it meant to confer standing on *all* the kinds and classes of persons . . . *without exception.*” *Id.* at 799 (internal quotations and citations omitted; emphasis supplied). Using this definition, plaintiff unquestionably has standing to represent the family of gamblers who lost money playing Defendant’s games.

### **THIS CASE IS NOT SUBJECT TO FEDERAL COURT JURISDICTION**

18. This action is not a class action. The legislature authorized “any person” to bring the suit, not just a person who could meet the requirements of Rule 23.

19. The Alabama Supreme Court has held that when a statute authorizes “any person” to bring an action, it means what it says. *See Bates v. Crane*, 157 So. 3d 171, 174-75 (Ala. 2014) (interpreting statute that allowed any person to bring complaint before police board).

20. Instead of a class action under Rule 23, this case is what is typically called a “private attorney general action.” *See Smith v. Southeastern Financial Corp.*, 337 So. 2d. 330 (Ala. 1976) (“The Civil Worthless Check Act by using the word ‘unlawful’ and allowing a civil action to be maintained regardless of whether a criminal action has been instituted promotes the private Attorney General concept.”). In such an action, the state or other governmental unit authorizes an individual to act on its behalf and enforce the statute in a private action to enforce a

public interest. See, e.g., National Consumers League v. Flowers Bakeries, LLC, 36 F. Supp. 3d 26, 32-33 (D.D.C. 2014). In the Flowers Bakeries case, the plaintiff brought the case, as authorized by a District of Columbia statute, on behalf of purchasers of particular types of bread, who would recover if it prevailed in the case. Id. at 29. Likewise, Ms. Seal brings this case as a private attorney general for the benefit of the family of Alabamians who have lost money to VGW in illegal gambling, pursuant to Section 8-1-150, which explicitly authorizes this type of suit. Ms. Seal does not seek to recover for the family members of any Alabamian who lost \$75,000 or more during the limitations period.

21. The United States Supreme Court has held that actions by an attorney general, no matter how many people may benefit from them, are not “mass actions” or “class actions” under the Class Action Fairness Act, and so cannot be removed to federal court. Mississippi ex rel. Hood v. AU Optronics Corp., 571 U.S. 161, 176 (2014). In Hood, the defendants argued that a case like this one was a mass action under CAFA because, even though there was a single plaintiff, 100 or more persons would benefit from a recovery in the action. Id. at 169. The Supreme Court, in a unanimous decision, rejected this argument, stating that the 100 or more persons mentioned in CAFA “are not unspecified individuals who have no actual participation in the suit, but instead the very ‘plaintiffs’ referred to later in the sentence—the parties who are proposing to join their claims in a single trial.” Id.



DOCUMENT 2

The Supreme Court stated: “CAFA’s ‘100 or more persons’ phrase does not encompass unnamed persons who are real parties in interest to claims brought by named plaintiffs.” Id. Likewise, the federal circuit courts of appeals that have considered the issue have unanimously held that an attorney general or private attorney general action not invoking Rule 23 or a state law counterpart is similarly not a class action with the meaning of CAFA. Canela v. Costco Wholesale Corp., 071 F.3d 845, 851 (9th Cir. 2020); Mississippi ex rel. Hood v. AU Optronics Corp., 701 F.3d 796, 799 (5th Cir. 2012), rev’d on other grounds, 571 U.S. 161. Because a suit by the Attorney General, like a private attorney general action, has only one plaintiff, and is not brought under Rule 23 or any state law equivalent, it is not removable under CAFA. Id. at 176. The same is true in the case at bar.

22. Since Hood was decided in 2014, multiple federal courts have relied upon it to hold that private attorney general suits are likewise not covered by CAFA, and thus not removable unless the claims of the named plaintiff exceed \$75,000 dollars in controversy. See, e.g., National Consumers League v. Flowers Bakeries, LLC, 36 F. Supp. 3d 26, 32-33 (D.D.C. 2014); Canela v. Costco Wholesale Corp., 971 F.3d 845, 853 (9th Cir. 2020). This case should likewise be heard in state court.

23. The federal courts do not have jurisdiction over this civil action because the plaintiff does not allege that she seeks to recover for any person an amount of

\$75,000 or more, exclusive of interest and costs. Therefore, diversity jurisdiction does not exist because of the lack of the requisite amount in controversy.

### **CLAIM FOR RELIEF**

24. Pursuant to Section 8-1-150(b) of the Alabama Code, Plaintiff Amy Nicole Seal seeks recovery of all sums paid by Alabama residents to VGW in its online gambling games during the period beginning one year before the filing of this complaint until this case is resolved, except that she does not seek recovery of any money lost by an Alabama resident who lost \$75,000 or more during the statute of limitations period.

25. Plaintiff seeks this recovery to go to the benefit of the families of the gamblers who paid the money, as required by Section 8-1-150(b).

### **PRAYER FOR RELIEF**

Plaintiff respectfully prays that this court:

- 1) take jurisdiction of this cause;
- 2) following discovery, enter a final judgment against VGW awarding to the family and next of kin of all gamblers that made payments from Alabama all money paid to play the illegal gambling games described herein, except for amounts paid by gamblers who lost \$75,000 or more during the statute of limitations period;

- 3) appoint a special master to determine all proper recipients of the money at issue;
- 4) award interest and costs; and
- 5) award any other relief to which the Court finds plaintiff and the family members are entitled.

/s/ Jeffrey L. Bowling  
Jeffrey L. Bowling  
One of the Attorneys for Plaintiff

**COUNSEL:**

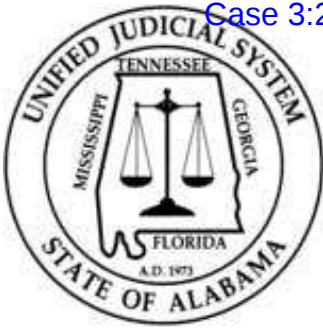
Jeffrey L. Bowling  
BEDFORD, ROGERS & BOWLING, P.C.  
303 North Jackson Street  
P.O. Box 669  
Russellville, AL 35653-0669  
Telephone: 256.332.2880  
jeffbbrbpc@bellsouth.net

John E. Norris  
D. Frank Davis  
Wesley W. Barnett  
Dargan M. Ware  
DAVIS & NORRIS, LLP  
Telephone: 205.930.9900  
Facsimile: 205.930.9989  
jnorris@davisnorris.com  
fdavis@davisnorris.com  
wbarnett@davisnorris.com  
dware@davisnorris.com

PLEASE SERVE BY CERTIFIED MAIL, RETURN RECEIPT:

VGW, LTD.  
VGW Holdings US, Inc.  
VGW US, Inc.  
VGW Luckyland, Inc.  
1840 Folsom Street  
Suite 302  
Boulder, CO 80302

DOCUMENT 2



## AlaFile E-Notice

33-CV-2023-900115.00

To: JEFFREY LOWELL BOWLING  
jeffbrbpc@bellsouth.net

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## NOTICE OF ELECTRONIC FILING

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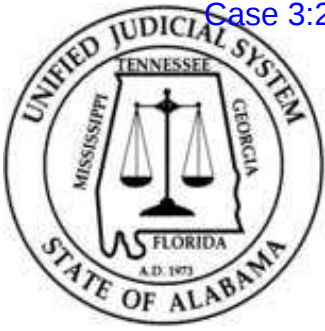
IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

AMY NICOLE SEAL V. VGW, LTD ET AL  
33-CV-2023-900115.00

The following complaint was FILED on 8/25/2023 12:03:33 PM

Notice Date: 8/25/2023 12:03:33 PM

ANITA SCOTT  
CIRCUIT COURT CLERK  
FRANKLIN COUNTY, ALABAMA  
P. O. BOX 160  
RUSSELVILLE, AL, 35653  
256-332-8861



## AlaFile E-Notice

33-CV-2023-900115.00

To: VGW, LTD  
1840 FOLSOM STREET  
SUITE 302  
BOULDER, CO, 80302

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## NOTICE OF ELECTRONIC FILING

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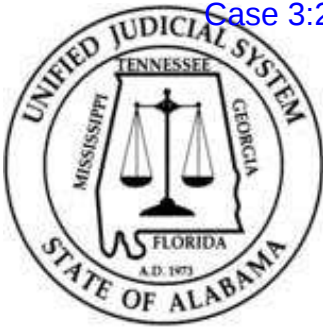
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SUITE 302  
BOULDER, CO, 80302

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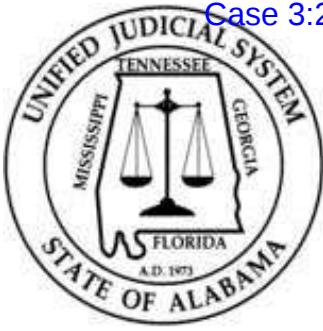
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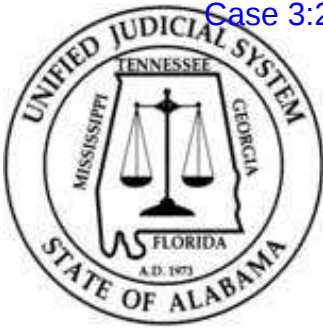
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33-CV-2023-900115.00

To: VGW LUCKYLAND, INC.  
1840 FOLSOM STREET  
SUITE 302  
BOULDER, CO, 80302

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| <b>State of Alabama</b><br><b>Unified Judicial System</b><br><b>Form C-34 Rev. 4/2017</b> | <b>SUMMONS</b><br><b>- CIVIL -</b> | <b>Court Case Number</b><br><b>33-CV-2023-900115.00</b> |
|---|------------------------------------|---|

**IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA**  
**AMY NICOLE SEAL V. VGW, LTD ET AL**

**NOTICE TO:** VGW, LTD, 1840 FOLSOM STREET SUITE 302, BOULDER, CO 80302  

(Name and Address of Defendant)

---

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
 JEFFREY LOWELL BOWLING  

(Name(s) of Attorney(s))

---

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 669, RUSSELLVILLE, AL 35653  

(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

**TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:**

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of AMY NICOLE SEAL  

(Name(s))

  
 pursuant to the Alabama Rules of the Civil Procedure.

08/25/2023 /s/ ANITA SCOTT By: \_\_\_\_\_  

(Date)
(Signature of Clerk)
(Name)

---

☒ Certified Mail is hereby requested. /s/ JEFFREY LOWELL BOWLING  

(Plaintiff's/Attorney's Signature)

**RETURN ON SERVICE**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_  

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☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to \_\_\_\_\_  
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(Name of Person Served)
(Name of County)

Alabama on \_\_\_\_\_  

(Date)

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**IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA**  
**AMY NICOLE SEAL V. VGW, LTD ET AL**

**NOTICE TO:** VGW HOLDINGS US, INC., 1840 FOLSOM STREET SUITE 302, BOULDER, CO 80302  

(Name and Address of Defendant)

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 JEFFREY LOWELL BOWLING  

(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 669, RUSSELLVILLE, AL 35653  

(Address(es) of Plaintiff(s) or Attorney(s))

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 pursuant to the Alabama Rules of the Civil Procedure. (Name(s))

08/25/2023 /s/ ANITA SCOTT By: \_\_\_\_\_  
 (Date) (Signature of Clerk) (Name)

☒ Certified Mail is hereby requested. /s/ JEFFREY LOWELL BOWLING  
 (Plaintiff's/Attorney's Signature)

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Alabama on \_\_\_\_\_  
 (Date)

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**AMY NICOLE SEAL V. VGW, LTD ET AL**

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 JEFFREY LOWELL BOWLING  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 669, RUSSELLVILLE, AL 35653  
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08/25/2023  
*(Date)*
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*(Signature of Clerk)*
By: \_\_\_\_\_  
*(Name)*

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(Name and Address of Defendant)

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(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 669, RUSSELLVILLE, AL 35653  

(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

**TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:**

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of AMY NICOLE SEAL  
 pursuant to the Alabama Rules of the Civil Procedure. (Name(s))

08/25/2023 /s/ ANITA SCOTT By: \_\_\_\_\_  
(Date) (Signature of Clerk) (Name)

☒ Certified Mail is hereby requested. /s/ JEFFREY LOWELL BOWLING  
(Plaintiff's/Attorney's Signature)

**RETURN ON SERVICE**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_  
(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to \_\_\_\_\_  
 \_\_\_\_\_ in \_\_\_\_\_ County,  
(Name of Person Served) (Name of County)

Alabama on \_\_\_\_\_  
(Date)

\_\_\_\_\_  
 (Type of Process Server)

\_\_\_\_\_  
 (Server's Signature)

\_\_\_\_\_  
 (Address of Server)

\_\_\_\_\_  
 (Server's Printed Name)

\_\_\_\_\_  
 (Phone Number of Server)

**Domestic Mail Only**

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

CV 239-00115

**Certified Mail Fee**

3

**Extra Services & Fees (check box, add fee as appropriate)**

☐ Return Receipt (hardcopy) \$ \_\_\_\_\_☐ Return Receipt (electronic) \$ \_\_\_\_\_☐ Certified Mail Restricted Delivery \$ \_\_\_\_\_☐ Adult Signature Required \$ \_\_\_\_\_

☐ Adult Signature Restricted Delivery \$ \_\_\_\_\_

Postmark  
Here

Postage

**④**

**Total Postage and Fees**

17.07

**Sent To**

# VGW US Inc

Street and Apt. No.      P.O. Box No.

et and Apt. No., or P.O. Box No.  
1840 E 50th St Ste 302

City, State, ZIP:

Boulder Co 80300

**Domestic Mail Only**

For delivery information, visit our website at [www.usps.com](http://www.usps.com).

**Abstract**

**\$**

☐ Return Receipt (hardcopy) \$ \_\_\_\_\_☐ Return Receipt (electronic) \$ \_\_\_\_\_☐ **Certified Mail Restricted Delivery** \$ \_\_\_\_\_☐ **Adult Signature Required**      \$ \_\_\_\_\_☐ Adult Signature Restricted Delivery \$ \_\_\_\_\_

Postage

**\$**

**Total Postage and Fees**

1

Sent To

Street and P. O. No. or P. O. Box No.

City: St. Louis, MO ZIP: 63104

Postmark  
Here

17.07

1/GW Holdings US Inc

1840 Folsom St Ste 302

Boulder Co 80305

**Domestic Mail Only**

**For delivery information, visit our website at [www.usps.com](http://www.usps.com)**

CV23900115

**Certified Mail Fee**

\$

**Extra Services & Fees (check box, add fee as appropriate)**

☐ Return Receipt (hardcopy) \$ \_\_\_\_\_☐ Return Receipt (electronic) \$ \_\_\_\_\_☐ Certified Mail Restricted Delivery \$ \_\_\_\_\_☐ Adult Signature Required \$ \_\_\_\_\_☐ Adult Signature Restricted Delivery \$ \_\_\_\_\_

Postage

19

**Total Postage and Fees**

**3**

Sent To

Street and Apt. No. or P.O. Box No.

City, State, Zip+4

PS Form JB00, April 2015 PSN 7530-02-000-3047

**See Reverse for Instructions**

Postmark  
Here

Postage and Fees 17.07

To VGW Luckyland Inc  
and Apt. No., or P.O. Box No.  
1340 Folsom St Ste 302  
Boulder Co 80502



U.S. Postal Service

## CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

CV 239 00116

Certified Mail Fee

\$

Extra Services &amp; Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$ \_\_\_\_\_
- ☐ Return Receipt (electronic) \$ \_\_\_\_\_
- ☐ Certified Mail Restricted Delivery \$ \_\_\_\_\_
- ☐ Adult Signature Required \$ \_\_\_\_\_
- ☐ Adult Signature Restricted Delivery \$ \_\_\_\_\_

Postmark  
Here

Postage

\$

Total Postage and Fees

\$

17.07

Sent To

Street and Apt. No., or P.O. Box No.

City, State, ZIP+4®

2022 3330 0002 3230 0325

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to

CV 8390016  
 VGLW LTD  
 1840 Folsom St Ste 302  
 Boulder Co 80302



9590 9402 7887 2234 6752 43

2. Article Number (Transfer from service label)

7022 3330 0002 3230 8325

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

☒ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below:

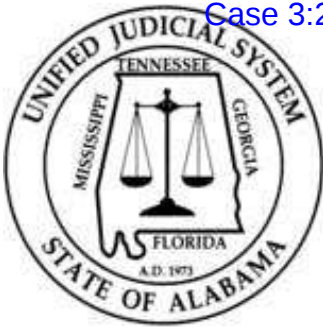
☐ No

SEP 13 2023  
 10:00 AM  
 USPS  
 BLDG 1000

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Insured Mail☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery

all Restricted Delivery



## AlaFile E-Notice

33-CV-2023-900115.00

Judge: BRIAN P HAMILTON

To: BOWLING JEFFREY LOWELL  
jeffbrbpc@bellsouth.net

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## NOTICE OF SERVICE

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IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

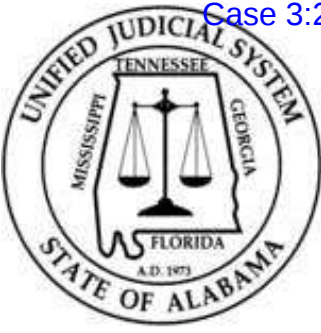
AMY NICOLE SEAL V. VGW, LTD ET AL  
33-CV-2023-900115.00

The following matter was served on 9/18/2023

D001 VGW, LTD  
Corresponding To  
CERTIFIED MAIL

ANITA SCOTT  
CIRCUIT COURT CLERK  
FRANKLIN COUNTY, ALABAMA  
P. O. BOX 160  
RUSSELVILLE, AL, 35653

256-332-8861



## AlaFile E-Notice

33-CV-2023-900115.00

Judge: BRIAN P HAMILTON

To: MCREYNOLDS JOHN ANDREW IV  
johnmcbrbpc@gmail.com

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## NOTICE OF SERVICE

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IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

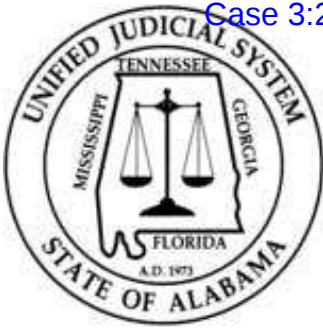
AMY NICOLE SEAL V. VGW, LTD ET AL  
33-CV-2023-900115.00

The following matter was served on 9/18/2023

D001 VGW, LTD  
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ANITA SCOTT  
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RUSSELVILLE, AL, 35653

256-332-8861



## AlaFile E-Notice

33-CV-2023-900115.00

Judge: BRIAN P HAMILTON

To: HARGETT EVAN MICHAEL  
evanbrbpc@gmail.com

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## NOTICE OF SERVICE

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IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

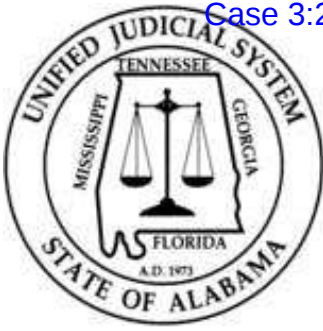
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RUSSELVILLE, AL, 35653

256-332-8861



## AlaFile E-Notice

33-CV-2023-900115.00

Judge: BRIAN P HAMILTON

To: DAVIS DUDLEY FRANK  
fdavis@davisnorris.com

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## NOTICE OF SERVICE

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IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

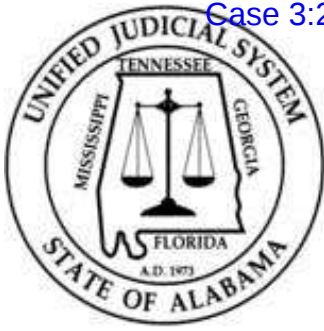
AMY NICOLE SEAL V. VGW, LTD ET AL  
33-CV-2023-900115.00

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D001 VGW, LTD  
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CIRCUIT COURT CLERK  
FRANKLIN COUNTY, ALABAMA  
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RUSSELVILLE, AL, 35653

256-332-8861



## AlaFile E-Notice

33-CV-2023-900115.00

Judge: BRIAN P HAMILTON

To: NORRIS JOHN EDWARD  
jnorris@davisnorris.com

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## NOTICE OF SERVICE

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IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

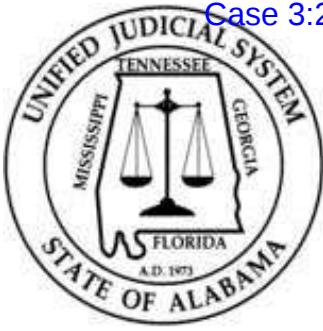
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33-CV-2023-900115.00

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256-332-8861



## AlaFile E-Notice

33-CV-2023-900115.00

Judge: BRIAN P HAMILTON

To: WARE DARGAN MANER  
dware@davisnorris.com

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## NOTICE OF SERVICE

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IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

AMY NICOLE SEAL V. VGW, LTD ET AL  
33-CV-2023-900115.00

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Corresponding To  
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RUSSELVILLE, AL, 35653

256-332-8861